

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PAULA DISBERRY,

Plaintiff,

v.

EMPLOYEE RELATIONS COMMITTEE OF  
THE COLGATE-PALMOLIVE COMPANY,  
ALIGHT SOLUTIONS, LLC, AND THE BANK  
OF NEW YORK MELLON CORPORATION,

Defendants.

Case No. 22-CV-5778 (CM) (OTW)

Hon. Colleen McMahon

**MARGARET M. HLOUSEK DECLARATION IN SUPPORT OF  
ALIGHT SOLUTIONS LLC'S MOTION TO SEAL**

I, Margaret M. Hlousek, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney at Jenner & Block LLP and counsel to Alight Solutions LLC (“Alight”) in the above captioned action.
2. I submit this declaration in support of Alight’s motion to file documents under seal.
3. Alight moves to dismiss Plaintiff Disberry’s claim. In support of its motion to dismiss Ms. Disberry’s complaint, Alight submits a declaration from Alight’s Director of Investigations, Jeffrey K. Barry (the “Barry Declaration”). Alight seeks to file under seal two exhibits to the Barry Declaration.
4. Exhibit A to the Barry Declaration is the Master Services Agreement entered into between the Colgate-Palmolive Company and Alight (then known as Hewitt LLC). This document contains commercially sensitive information, which if disclosed could cause harm to Alight. A true and correct copy of the Master Services Agreement is attached hereto as Exhibit A.


5. Exhibit B to the Barry Declaration is Alight's Report of Investigation related to Ms. Disberry's claims of identity theft and fraud. If publicly filed, the Report may serve as a roadmap for other bad actors who want to perpetrate a similar fraud, may be accessible to the actual bad actor who targeted Ms. Disberry, shows findings from Alight's investigation, or may compromise ongoing law enforcement investigations into Ms. Disberry's claims. A true and correct copy of the Report of Investigation is attached hereto as Exhibit B.

6. This Court has not yet entered a Protective Order in this case.

7. I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 15, 2022

Respectfully submitted,

A handwritten signature in black ink, reading "Margaret M. Hlousek" with a stylized flourish at the end.

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